

**LOWENSTEIN SANDLER LLP**

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for Class Action Plaintiffs*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SINO-FOREST CORPORATION,

Debtor in a Foreign Proceeding

Chapter 15

Case No. 13-10361 (MG)

**CLASS ACTION PLAINTIFFS' STATEMENT  
IN RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE  
DATED AUGUST 27, 2021 (DOCKET NO. 81)**

Lowenstein Sandler, LLP ("Lowenstein"), who has served as United States Bankruptcy Counsel to the Class Action Plaintiffs in the above-captioned Chapter 15 proceeding (the "Chapter 15 Case"), submits this statement in connection with the Court's Order to Show Cause Why This Chapter 15 Case Should Not Be Closed (the "Court's OTSC") in an attempt to assist the Court in obtaining a final disposition of this Chapter 15 Case. We should point out that Lowenstein is not counsel to the Foreign Debtor or Foreign Representative in this Chapter 15 Case, but based upon its active role in prior proceedings before this Court, has attempted to coordinate with Canadian Counsel on behalf of the Monitor and Foreign Representative, FTI Consulting Canada Inc., so as to be able to respond to the Court's OTSC as follows:

1. Lowenstein has been advised by Canadian Counsel to the Monitor that the Monitor intends to move (the "Motion") before the Honorable Chief Justice Morawetz of the

Ontario Superior Court of Justice (Commercial List) (the “Canadian Court”) to terminate the pending CCAA proceeding of Sino-Forest Corporation (the “CCAA Proceeding”) and, in the context of the Motion, obtain authority to voluntarily dismiss the Chapter 15 Case. The Motion and the Monitor’s Seventeenth Report are currently being finalized and the Monitor has obtained an October 20, 2021 hearing date from the Canadian Court in that regard. Upon the filing of the Motion and the Seventeenth Report, Lowenstein will file a Notice of Filing of Motion Record with this Court providing a copy of the pleadings filed in the Canadian Court.

2. Attached hereto as Exhibit 1 is a status report from Canadian Counsel to the Monitor dated September 10, 2021 confirming the Monitor’s intention as set forth above, including the intent to voluntarily dismiss this Chapter 15 Case upon the entry of an Order by the Canadian Court granting the Monitor’s Motion.

3. In an effort to see this process through to completion, Lowenstein, through the undersigned, will remain available to the Court to attempt to respond to any further inquiries and coordinate with Canadian Counsel to the Monitor.

Respectfully submitted,

Dated: September 13, 2021

**LOWENSTEIN SANDLER LLP**

/s/ Michael S. Etkin

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